

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DAVID MURDOCK, Individually and as) Father and Next Friend of BEAU FARISH) MURDOCK and ANABELLE SAGE) MURDOCK, minor children, on behalf of) Civil Action No. 2:07-CV-03376 (WHW-MF) all others similarly situated,)) Plaintiffs,)) v.)) RC2 CORPORATION, LEARNING) CURVE BRANDS, INC., LEARNING) CURVE BRANDS, INC. d/b/a RC2) BRANDS, INC., WAL-MART STORES,) INC. and TOYS "R"US, INC.,)) Defendants.))

**[PROPOSED] ORDER ON CROSS-
MOTION FOR STAY OF PROCEEDINGS
AND FOR EXTENSION OF TIME TO
ANSWER**

[Document Electronically Filed]

This matter having been presented to the Court by Edwards Angell Palmer & Dodge LLP, counsel for Defendants, RC2 Corporation, Learning Curve Brands, Inc, and Toys "R" Us, Inc. (collectively "Moving Defendants") who have filed their Notice of Cross-Motion for Stay of Proceedings and for Extension of Time to Answer, and the Court having considered the papers submitted and for other good cause shown, it is on this _____ day of September, 2007,

ORDERED that the time for all Defendants to answer, move or otherwise respond to the Class Action Complaint in this matter is extended to and including thirty (30) days following entry of an order by the Judicial Panel on Multidistrict Litigation ("JPML") (i) transferring this case to an MDL transferee district, or (ii) denying Moving Defendants' pending Motion for Transfer of Actions to the Northern District of Illinois for Coordinated Pre-Trial Proceedings Pursuant to 28 U.S.C. § 1407 ("Motion for Transfer") and two other motions pending before the JPML relating to this action; and it is further

ORDERED that all other proceedings in this action are stayed as to all Parties pending entry of an order by the JPML (i) transferring this case to an MDL transferee district, or (ii) denying the Motion for Transfer and two other motions pending before the JPML relating to this action.

United States District Judge

205350

CERTIFICATION OF SERVICE

I hereby certify that on September 10, 2007, a true copy of the within [Proposed] Order on Cross-Motion for Stay of Proceedings and For Extension of Time to Answer was served pursuant to the Federal Rules of Civil Procedure, and/or the District of New Jersey's Local Rules and/or the District of New Jersey's ECF Policies and Procedures and by sending same via first class mail service offered by the U.S. Postal Service, in postage paid envelopes addressed to the following counsel for the parties at the addresses indicated:

Peter S. Pearlman, Esq.
COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
Park 80 Plaza West-One
Saddle Brook, NJ 07663

Attorneys for Plaintiffs

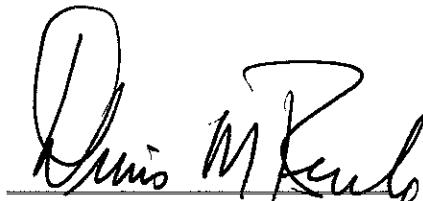
Jack Reise, Esq.
Stuart A. Davidson, Esq.
James L. Davidson, Esq.
COUGHLIN STOIA GELLER RUDMAN &
ROBBINS LLP
120 E. Palmetto Park Road, Suite 500
Boca Raton, FL 33432-4809

Attorneys for Plaintiffs

Richard D. Millett, Esq.
RICHARD D. MILLETT & ASSOCIATES
LLC
1065 Route 22 West, Suite 1A
Bridgewater, NJ 08807

Attorneys for Defendant Wal-Mart Stores, Inc.

Executed on: September 10, 2007


Dennis M. Reznick